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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA

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IN RE:

BRISTLECONE, INC. DBA  
BRISTLECONE HOLDINGS,

BOONFI LLC,

BRISTLECONE LENDING, LLC,

BRISTLECONE SPV I, LLC

I DO LENDING, LLC

MEDLY, LLC

ONE ROAD LENDING, LLC

WAGS LENDING, LLC

Debtors.

Case No. 17-50472-btb  
Case No. 17-50473-btb  
Case No. 17-50474-btb  
Case No. 17-50475-btb  
Case No. 17-50476-btb  
Case No. 17-50478-btb  
Case No. 17-50479-btb  
Case No. 17-50480-btb  
(Chapter 11)

**MOTION FOR JOINT ADMINISTRATION OF  
CHAPTER 11 BANKRUPT ESTATES  
PURSUANT TO F.R.B.P. 1015(b)**

Hearing Date: OST Pending  
Hearing Time: OST Pending  
Est. Time: 10 minutes  
Set by: Judge Beesley

COMES NOW BRISTLECONE, INC. DBA BRISTLECONE HOLDINGS; BOONFI LLC; BRISTLECONE LENDING, LLC; BRISTLECONE SPV I, LLC; I DO LENDING, LLC; MEDLY, LLC; ONE ROAD LENDING, LLC; and WAGS LENDING, LLC, by and through their proposed attorneys, STEPHEN R. HARRIS, ESQ., of HARRIS LAW PRACTICE LLC, and hereby moves this Court for the issuance of an order authorizing joint administration of their Chapter 11 bankruptcy reorganization cases with the Chapter 11 case BRISTLECONE, INC. DBA BRISTLECONE HOLDINGS, Case No. 17-50472-btb to be designated as the lead case, pursuant to Federal Rules of Bankruptcy Procedure 1015(b), and alleges as follows:

1. Eight (8) Voluntary Petitions for Relief under Chapter 11 of the United States Bankruptcy Code were filed by the following entities (collectively referred to as "Debtor Entities"):

- a. BRISTLECONE INC. dba BRISTLECONE HOLDINGS, Case No. 17-50472-btb, filed April 18, 2017;
- b. BOONFI LLC, a Nevada limited liability company, Case No. 17-50473-btb, filed April 18, 2017;
- c. BRISTLECONE LENDING, LLC, a Nevada limited liability company, Case No. 17-50474-btb, filed April 18, 2017;
- d. BRISTLECONE SPV I, LLC, a Nevada limited liability company, Case No. 17-50475-btb, filed April 18, 2017;
- e. I DO LENDING, LLC, a Nevada limited liability company, Case No. 17-50476-btb, filed April 18, 2017;
- f. MEDLY, LLC, a Nevada limited liability company, Case No. 17-50478-btb, filed April 18, 2017;
- g. ONE ROAD LENDING, LLC, a Nevada limited liability company, Case No. 17-50479-btb, filed April 18, 2017; and
- h. WAGS LENDING, LLC, a Nevada limited liability company, Case No. 17-50480-btb, filed April 18, 2017.

1 An application has been filed concurrently in each of the Chapter 11 cases that seeks the  
2 appointment of STEPHEN R. HARRIS, ESQ. of HARRIS LAW PRACTICE LLC, as the  
3 general bankruptcy counsel for each of the Debtor Entities.

4 2. With respect to the eight (8) filing Debtor Entities, the ownership contacts and  
5 affiliations with respect to each of the Debtor Entities, are described as follows:

6 a. BRISTLECONE, INC. DBA BRISTLECONE HOLDINGS, is owned by  
7 fourteen (14) shareholders and has common creditors with the other seven (7)  
8 Debtor Entities.

9 b. BRISTLECONE, INC. DBA BRISTLECONE HOLDINGS owns 100% of  
10 the membership interest in the remaining seven (7) Debtor Entities: BOONFI  
11 LLC; BRISTLECONE LENDING, LLC; BRISTLECONE SPV I, LLC; I DO  
12 LENDING, LLC; MEDLY, LLC; ONE ROAD LENDING, LLC; and WAGS  
13 LENDING, LLC.

14 c. Additionally, the Debtor Entities are all borrowers/guarantors on a loan from  
15 FRS BC, LLC, as assignee to Princeton Alternative Income Fund, LP and  
16 Westminster National Capital Co., LLC, except for BOONFI LLC.

17 d. The Debtors all share the same after-market lease servicer, Monterey  
18 Financial Services.

19 e. The Debtor Entities are all parties in certain litigation initiated pre-petition by  
20 Nextep Funding, LLC.

21 f. The Debtor Entities all share the same business location, common overhead  
22 expenses and personnel.

23 The Debtor Entities will be working together throughout their Chapter 11 proceedings to  
24 administer their assets and financial affairs in order to effectively reorganize for the benefit of  
25 their allowed creditors.

26 3. Federal Rules of Bankruptcy Procedure 1015(b) states as follows:

27 (b) Cases Involving Two or More Related Debtors. If a joint  
28 petition or two or more petitions are pending in the same court by  
or against (1) a husband and wife, or (2) a partnership and one or

1 more of its general partners, or (3) two or more, general partners,  
 2 or (4) a debtor and an affiliate, the court may order a joint  
 3 administration of the estates. Prior to entering an order the court  
 shall give consideration to protecting creditors of different estates  
 against potential conflicts of interest. . . .

4 (c) Expediting and Protective Orders. When an order for  
 5 consolidation or joint administration of a joint case or two or more  
 6 cases is entered pursuant to this rule, while protecting the rights of  
 the parties under the Code, the court may enter orders as may tend  
 7 to avoid unnecessary costs and delay.

8 For the reasons set forth hereinabove with respect to the significant common control of assets  
 9 and substantial overlapping liabilities and business operations by and between the Debtor  
 10 Entities, joint administration of these Chapter 11 cases would promote the interest and  
 11 convenience of all parties and would reduce all costs of administration of these cases, with  
 12 integrated administration in the best interests of the separate estates. Furthermore, the parties  
 13 are not aware of any potential conflicts of interest that would arise if these cases were jointly  
 14 administered.

15 4. No prior motion for relief herein requested has been filed in this case.

16 **WHEREFORE**, BRISTLECONE, INC. DBA BRISTLECONE HOLDINGS; BOONFI  
 17 LLC; BRISTLECONE LENDING, LLC; BRISTLECONE SPV I, LLC; I DO LENDING, LLC;  
 18 MEDLY, LLC; ONE ROAD LENDING, LLC; and WAGS LENDING, LLC, requests an Order  
 19 authorizing the joint administration of all of these Chapter 11 cases, with BRISTLECONE,  
 20 INC. DBA BRISTLECONE HOLDINGS, Case No. 17-50472-btb to be designated as the lead  
 21 case; and for such other and further relief as is just and proper under the circumstances.

22 Dated this 21<sup>st</sup> day of April, 2017.

23 HARRIS LAW PRACTICE LLC  
 24 /s/ Stephen R. Harris

25 STEPHEN R. HARRIS, ESQ.  
 26 Proposed Attorneys for Debtor  
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